

FILED
UNITED STATES DISTRICT COURT FOR THE CLERKS OFFICE
DISTRICT OF MASSACHUSETTS

2005 OCT 19 P 12:44

IN RE: Request from Turkey Pursuant)
to the Treaty on Extradition)
and Mutual Assistance in)
Criminal Matters Between the)
United States of America and)
the Republic of Turkey)

U.S. DISTRICT COURT
Case No. JTR05-95320-RGS

NOTICE OF COMPLETION OF COMMISSION

I, S. Waqar Hasib, Assistant United States Attorney for the District of Massachusetts, having been appointed Commissioner by Order of this Court filed on August 25, 2005, for the purpose of taking evidence in accordance with the request of the Republic of Turkey, notify the Court that I have completed the requirements of such appointment to the extent possible.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By:


S. WAQAR HASIB
Assistant United States Attorney

cc: Office of International Affairs
Washington, D.C.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No.: 1:04 CV117721-RGS

WILLIAM B. EGAN, III,)
Plaintiff)
)
v.)
)
BECHTEL CORPORATION,)
PARSONS, BRINCKERHOFF, QUADE)
AND DOUGLAS, INCORPORATED, and)
DYWIDAG SYSTEMS INTERNATIONAL,)
Defendants)
)

**DEFENDANTS, BECHTEL CORPORATION, PARSONS,
BRINCKERHOFF, QUADE & DOUGLAS, INCORPORATED'S,
AUTOMATIC DISCLOSURE**

The Defendants, Bechtel Corporation, Parsons, Brinckerhoff, Quade & Douglas, Incorporated make this disclosure in accordance with Fed. R. Civ. P. 26(a)(1) Local Rules 26.2(a).

I. Persons With Relevant Discoverable Information

The following individuals may possess discoverable information relevant to the claims alleged in the complaint and/or the defenses of the defendants.

1. William Egan, III
87 River Street
Middleboro, MA 02346

The plaintiff may possess information regarding the accident which occurred on June 29, 2002 and the equipment being utilized at the time of the accident. The plaintiff may possess information concerning the instruction that he received in connection with the use of the equipment. The plaintiff more likely than not possesses information concerning the injuries that

he received in connection with the use of the equipment. The plaintiff more likely than not possesses information concerning the injuries that he received as a result of the accident.

2. David Crockett
185 Kneeland Street
Boston, MA

Mr. Crockett is the Safety & Health Manager for Bechtel/Parsons Brinckerhoff, Joint Venture (B/PB). B/PB is the Management Consultant for the Central Artery/Tunnel Project (CA/T Project). Mr. Crockett possesses information concerning B/PB's role on the CA/T Project; the function of B/PB's Safety & Health Team with respect to the monitoring of contractors involved with the CA/T Project; the responsibilities of the general contractors with respect to safety at each specific project; Modern Continental's safety program; and the investigation of this accident by B/PB.

3. Tim Dare
Former employee of Modern Continental Construction Company
Last known residence was California

Mr. Dare was Modern Continental's Safety Manager at the time of the accident. It is believed that Mr. Darer investigated Mr. Egan's accident; Mr. Dare may possess knowledge concerning Modern's safety responsibilities with respect to the C19B1 Project.

4. Barry Kirk
Ironworker for Modern Continental
Address Unknown

It is believed that Mr. Kirk was working with Mr. Egan at the time of the accident. Mr. Kirk may possess information concerning the accident.

5. Derrick Angelo
Modern Continental's Ironworker Foreman
Address Unknown

It is believed that Mr. Angelo was immediately notified after the accident.

6. Scott Scorpia
Modern Continental's Superintendent
Address Unknown

Mr. Scorpia was notified immediately after the plaintiff's accident.

7. Dan Morrison
185 Kneeland Street
Boston, MA

Mr. Morrison was part of the CA/T safety team. It is believed that Mr. Morrison may possess information concerning the plaintiff's accident.

8. Joubin Hossanein

It is believed that Mr. Hossanein works for Modern Continental and is likely to have information concerning this accident.

II. Documents in the Possession, Custody or Control of B/PB That Are Relevant to the Disputed Facts Alleged.

B/PB states that it possesses the following documents that are available for inspection:

1. B/PB Field Engineer Daily Reports relating to the C19B1 Project.
2. The C19B1 Contract between Modern Continental and the Massachusetts Highway Department.
3. The Joint Venture Agreement between Bechtel Corporation and Parsons Brinckerhoff, Quade & Douglas, Inc.
4. Modern Continental's Health and Safety Plan relating to the C19B1 Project.
5. Photographs of the accident scene.
6. Photographs of the product alleged to have been involved in the accident.
7. Modern Continental's Accident Investigation Report.
8. Modern Continental's Job Hazard Analysis relating to this work activity.
9. Statement of William Egan.

10. B/PB's contract with the Massachusetts Highway Department.

Bechtel Parsons Brinckerhoff, Joint Venture states that there are voluminous materials which could be arguably be related to this claim, including blueprints and drawings. The above-referenced documents identified by B/PB appear to be documents that are most clearly related to this accident. B/PB reserves the right to supplement this initial list of documents if additional documents become known and available.

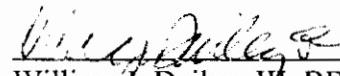
III. Computation of Damages.

Not applicable.

IV. Insurance Agreements.

B/PB is insured through an insurance agreement with AIG. The policy limits are \$25,000,000 per occurrence and \$25,000,000 general aggregate. This policy will be made available for inspection and copying.

Respectfully submitted,
BECHTEL CORPORATION,
PARSONS, BRINCKERHOFF,
QUADE AND DOUGLAS, INC.,
The Defendants,
By Their Attorney,


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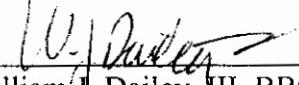
Dated: 10/18/05

CERTIFICATE OF SERVICE

I, William J. Dailey, III, Esq., hereby certify that on October 18, 2005, I served a true copy of the foregoing document, upon the following parties of record, by first class mail, postage prepaid, to:

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